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Review Comments for Draft Technical Memorandum Number 7, Operable Unit 2

R. Schassburger, Rocky Flats Office

The Office of Southwestern Area Programs, Rocky Flats/Albuquerque Production Division (EM-453), has reviewed the "Draft Technical Memorandum Number 7, Addendum to Final Phase II Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation Work Plan, Surface Soil Sampling and Analysis Plan, Rocky Flats Plant 903 Pad, Mound, and East Trenches (Operable Unit (OU) 2)" document and has prepared the attached comments (see Attachment 1) for your consideration in preparing the final document. Please address these comments during the document finalization process. The draft form of these comments were faxed to you earlier on March 3, 1993.

A major concern we have with this document is that the purpose of this Sampling and Analysis Plan is to propose additional surface soil samples to include all radioactive and non-radioactive contaminants that are potentially present at OU 2. However, the document fails to provide sufficient evidence to justify the sampling plan. As indicated by the document, numerous soil studies have already been made. The results of these studies are briefly reviewed in the text, but the data presented does not present a precise analysis of the nature and extent of contamination in the area. For example, it is proposed to sample semivolatile organic compounds and pesticides, and polychlorinated biphenyls over a very large area based on their detection in boreholes, but no information is given on their frequency of detection or their extent that would indicate whether there is real reason to believe that they would be dispersed over the proposed sample area. The analyte list needs to be much better justified.

Another major concern we have is that the sampling strategy is poorly presented and is very confusing. Although the chief concern is presumably wind dispersion, it is never clearly stated why the sampled area is to be extended to nearly a mile east of the source areas or why the sampled area is shaped as it is. Although the document repeatedly states that an adequate number of samples will be collected, there is no evidence supporting the statement. Sample locations and spacing seem to be

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somewhat arbitrary, and would not seem either to characterize the source areas well enough for remediation or to truly characterize contaminant distribution in the downwind area. The rationale of the sampling strategy should be clarified and presented in a clear manner.

Please contact me at (301) 903-8191, if you have any questions regarding these review comments.

Autar Rampertaap

Autar Rampertaap
Chief
Rocky Flats Branch
Rocky Flats/Albuquerque Production Division
Office of Southwestern Area Programs

Attachment

cc w/o attachment:
R. Greenberg, EM-453
J. Hartman, RF